

**IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

IN RE: JOHNSON & JOHNSON  
TALCUM POWDER PRODUCTS :MDL No. 2738  
MARKETING, SALES PRACTICES :(FLW) (LHG)  
AND PRODUCT LIABILITY LITIGATION

**SPECIAL MASTER ORDER NO. 4**

The Special Master having held a Zoom conference with the parties on July 21, 2021 subsequent to a Zoom status conference with Chief Judge Wolfson; and this Order intending to confirm the rulings made during the conferences with Chief Judge Wolfson and the Special Master; and for all the reasons discussed on the record, it is hereby ORDERED this 22nd day July, 2021, as follows:

1. The deadline to complete expert depositions is extended to September 15, 2021.
2. Defendants' depositions of plaintiffs' general causation experts is limited to four hours each and shall only address matters contained in the experts' supplemental reports.
3. Defendants' depositions of plaintiffs' three case specific experts is limited to two days for each expert.
4. The parties shall meet and confer and propose staggered deadlines for the parties to serve their final lists of trial experts for the first bellwether trial to be held in April 2022. The deadlines shall be contained in a proposed Scheduling Order to be served by July 30, 2021.
5. Plaintiffs' expert report(s) for Bonduant shall be served by August 6, 2021. Dr. Godleski's expert report shall be served by August 20, 2021. These deadlines may be extended by the Special Master for good cause shown.

6. The following time deadlines apply to the depositions of the following experts:

Dr. Wolf one day without prejudice to defendants' right to request additional time if Dr. Wolf is named as an expert in more than two cases; Dr. Godleski (two days); and Dr. Clark (two days).

7. By July 30, 2021, plaintiffs shall serve defendants with a good faith list of experts not likely to testify at the first bellwether trial.

8. The parties shall meet and confer to propose new scheduling deadlines to accommodate the scheduling changes noted herein, including a proposed date for service of the proposed Joint Final Pretrial Order. A proposed Scheduling Order shall be sent to Chief Judge Wolfson by July 30, 2021. The current deadline for the filing of summary judgment motions shall not be extended.

DATED: July 22, 2021

By: s/ Joel Schneider  
SPECIAL MASTER  
HON. JOEL SCHNEIDER (RET.)